

**IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA**

In re LE-NATURE'S, INC., et al.,)	Bankruptcy No. 06-25454 (MBM)
<i>Debtors</i>)	Chapter 11
)	Jointly Administered
Federal Insurance Company,)	
<i>Plaintiff</i>)	Chief Judge M. Bruce McCullough
)	
v.)	Adversary Proc. No. 07-02138 (MBM)
)	
Le-Nature's, Inc., Debtor; R. Todd Nielsen)	
as Chapter 11 Trustee for Le-Nature's, Inc.;)	
and Gregory Podlucky,)	
<i>Defendants</i>)	

**FEDERAL INSURANCE COMPANY'S MOTION TO
COMPEL RESPONSES TO DISCOVERY REQUESTS AND
TO DEEM REQUESTS FOR ADMISSIONS TO BE ADMITTED**

Plaintiff Federal Insurance Company ("Federal"), by and through its attorneys, pursuant to Federal Rules of Civil Procedure 36 and 37(a)(2)(B), as incorporated by Federal Rules of Bankruptcy Procedure 7036 and 7037, respectfully moves for an order:

1. That Defendant Gregory Podlucky ("Podlucky") respond to Federal's First Set of Document Requests and First Set of Interrogatories to Podlucky within ten (10) days of the order;
2. That any objections Podlucky might have asserted are waived based on his failure to timely respond to the document requests and interrogatories; and
3. That Federal's First Set of Requests for Admissions to Podlucky are deemed admitted as to Podlucky for all purposes in this Adversary Proceeding because of his failure to respond to them.

Dated: December 4, 2007

/s/ Dennis St. J. Mulvihill
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